

*Exhibit "C"*

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World of Work, Inc.

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www.theworldofwork.com

Robert D. Cox, M.A., C.R.C.  
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Suite 422  
Sugar Land, Texas 77479  
(281) 343-0999  
Fax (361) 589-4106

April 13, 2012

Mr. Brian J. Fisher  
Kane Russell Coleman & Logan PC  
3700 Thanksgiving Tower  
1601 Elm Street  
Dallas, Texas 75201

Re: Cause No. 4:10-cv-2388; Otis J. Hilliard v. Tyson Foods, Inc.; In the United States  
District Court for the Southern District of Texas, Houston Division

Dear Mr. Fisher:

You asked me to develop opinions about prospects for employment and earnings for Otis Hilliard. I am qualified to render these opinions based on my forty years of work as a Vocational Rehabilitation Counselor in Texas. I am licensed as a Professional Counselor in Texas and have national certification as a Rehabilitation Counselor through the Commission on Rehabilitation Counselor Certification. I have experience working with persons, helping them get back to work. I charge \$250.00 an hour for my expert witness work. I have attached my curriculum vitae and a list of cases in which I have either given trial testimony or deposition testimony for the last six years.

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***OTIS J. HILLIARD***

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I reviewed information about his work history, educational history, earnings history, and medical condition. Records I reviewed include:

**Documents:**

Plaintiff's Original Petition;  
Defendant's Original Answer;  
Plaintiff's Designation of Expert Witnesses;  
Plaintiff's Supplemental Designation of Expert Witnesses;  
Plaintiff's Responses to Request for Product, Request for Disclosure,  
Interrogatories and Request for Inspection;  
Plaintiff's First Supplemental Responses to Request for Production;  
Plaintiff's Supplementation of Discovery Responses – Neuropsychologist  
Exam;  
Defendant Tyson's Responses to Request for Production and Interrogatories;  
Defendant Tyson's Responses to Plaintiff's Second Interrogatories;  
Defendant Tyson's Responses to Plaintiff's Second Request for Production;  
Defendant Tyson's Documents Produced Bates Label: TYS 001- TYS 302;  
Color Photos;  
Social Security Administration records

**Depositions:**

Deposition of Otis Hilliard;  
DVD of Otis Hilliard deposition;  
Enrique Tamez;  
Daryl Terry;  
Joe Cepada;  
Kenneth Jones

**Employment Records:**

Precoat Metals;  
Kellogg Brown & Root – Personnel & Payroll;  
Grocer's Supply Co., Inc.  
Express Professionals

**OTIS J. HILLIARD**

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**Educational Records:**

National Education Center;  
Houston ISD (Scholastic Records)

**Medical Records:**

East Houston Regional Medical Center;  
St. Luke's Episcopal Hospital;  
Dr. Maximo Roth's  
Key Health Medical Solutions/Select Physical Medicine;  
Jeffrey Reuben, M.D.;  
Randolph Evans, M.D.;  
Dr. Lorenzo Bortolotti;  
Walgreen's Pharmacy; and  
Neuropsychological Associates/Shawanda Williams-Anderson, Ph.D.

From my review I learned this 42-year-old high school graduate continued his education to get electronics training at the national education center in 1987. His works history reflects activities in operating and controlling motorized vehicles. He has driven automobiles, forklifts, and operated overhead cranes. Most recently he was employed operating machinery to prepare meat products. In his deposition of January 20, 2011 he indicated that he completed a certification class to operate a sitting forklift at Grocers Supply.

On December 15, 2009 he experienced an electrical shock while working. Subsequently he sought medical treatment for complaints of pain on his left side and weakness to his upper extremities. He began using a cane to help with walking. He has undergone multiple medical examinations and psychological examinations. My review of these examinations and my review of the videotape of his deposition lead to my opinion that Mr. Hilliard would be able to work except for his complaints of pain. I saw no tremulousness in his upper extremities as the deposition progressed. He impressed me as being focused and able to concentrate throughout the deposition, which lasted from 10:09 am to 4:29 pm.

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**OTIS J. HILLIARD**

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Examples of jobs, which would take it vantage of Mr. Hilliard's work experiences and develop skills, include forklift operator, escort vehicle driver, and car rental return driver or delivery driver. Wages for these jobs are comparable to the wages he has earned in the past. Therefore it is my opinion, Mr. Hilliard will suffer no loss of future wage earning capacity at such time that he returns to work.

I would like to interview Mr. Hilliard to determine the extent to which there might be changes in his medical status or work status. I noticed that he was denied benefits from the Social Security Administration. I would like to inform him about the full range of vocational rehabilitation services available to him. I reserve the right to supplement this report upon receipt of additional records or information, which might result in changes to opinions expressed above.

Very truly yours

A handwritten signature in black ink, appearing to read "R. D. Cox". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

Robert D. Cox, MA, CRC  
Licensed Professional Counselor

Attachments

Robert Dewar Cox, MA, CRC, LPC  
Mail  
17424 W. Grand Parkway S., Suite 422  
Sugar Land, TX 77479  
281 343-0999 V  
281 343-9327 F  
Delivery  
7327 Timberlake Drive  
Greatwood-Shores  
Sugar Land, Texas 77479  
bob@theworldofwork.com  
EIN 74-211 4967

### Work History:

1996-Present	Elected Director/President Ft. Bend County Municipal Utility District #108,
1980-Present	President and Rehabilitation/Career Counselor World of Work, Inc.
2000-2005	Elected Director/Vice-President Greatwood Homeowner's Association
1973 - 1980	President & Rehabilitation Counselor, Southwest Rehabilitation Institute
1967 - 1972	Vocational Rehabilitation Counselor, Texas Rehabilitation Commission, Houston, TX

### Professional Affiliations:

National Rehabilitation Association: Treasurer 2010-2011  
Rehabilitation Counselors and Educators Association; Treasurer 2007-2009;  
President 2010  
Texas Vocational Evaluation and Work Adjustment Association; President 1976-1978  
Texas Rehabilitation Association  
Board Member at large, 1979-1981; 1998-2001  
President 1990-1992; President 2001; Treasurer 2004-2005  
Texas Rehabilitation Counseling Association  
President 1984-1986  
Houston Area Rehabilitation Association  
President 1987-88

### Advisory Member:

#### Past

Arkansas Rehabilitation Continuing Education Program  
Texas Representative, Vocational Rehabilitation of the Industrially Injured, 1979  
Coalition for Barrier Free Living, Houston, TX

Placement Committee

**Education, Certification and License:**

MA, University of Texas 1972

BA, University of Texas, 1966

Certified Rehabilitation Counselor #53, By National Commission on  
Rehabilitation Counselor Certification

Licensed as Professional Counselor, Texas # 4521

**Consultant:**

Present

Vocational Consultant to the Social Security Administration  
Office of Hearings and Appeals, since 1975

Past

Del Oro Hospital, Houston, TX

Memorial Southeast Hospital, Houston, TX

Stafford Meadows Hospital, Stafford, TX

West Oaks Hospital, Houston, TX

**Honors:**

Distinguished Service Award 1993, from City of Houston,  
Mayor Bob Lanier

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TESTIMONY HISTORY OF ROBERT COX

12/06/02 TRIAL; CAUSE NO. 61,225; SAMUEL ODGEN V. WESTERN ATLAS INTERNATIONAL, ET AL; IN THE 75<sup>TH</sup> JUDICIAL DISTRICT COURT OF LIBERTY COUNTY, TEXAS; JIM WETWISKA, ATTY

01/23/03 DEPOSITION; CAUSE NO. 02-0-57,548-B; DIST CT OF VICTORIA, TX; DURMENT VS CAVASOS; BRAD BARTLETT ATTY

02/04/03 DEPOSITION; CAUSE NO. A-166555; JIMMIE L. MONCEAUX VS. EFFICIENT SYSTEMS, INC. AND DAMON HEATH HOLMES; IN THE 58<sup>TH</sup> JUDICIAL DISTRICT COURT OF JEFFERSON COUNTY, TEXAS; JOSEPH W. GAGNON, ATTY

02/10/03 DEPOSITION; CAUSE NO. 2001-30860; CHRISTOPHER JAMES ANDERSON V. GARY NEIL GIBSON, BAKER HUGHES, INCORPORATION, BAKER HUGHES OILFIELD OPERATIONS, INC. d/b/a BAKER ATLAS, AND BAKER ATLAS, A DIVISION OF WESTERN ATLAS INTERNATIONAL, INC.; IN THE 189<sup>TH</sup> JUDICIAL DISTRICT COURT, HARRIS COUNTY, TEXAS; RICK STAFF, ATTY

02/13/03 DEPOSITION; CAUSE NO. 2:02CV03; PILGRIM'S PRIDE CORPORATION AND BUNCH AND ASSOCIATES, INC. VS. WILLIAM LUCAS; IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS, MARSHALL DIVISION; ATTY CURTIS FENLEY III

02/28/03 TRIAL; CAUSE NO. 2001-30860; CHRISTOPHER JAMES ANDERSON V. GARY NEIL GIBSON, BAKER HUGHES, INC., BAKER HUGHES OILFIELD OPERATIONS, INC. D/b/a BAKER ATLAS, AND BAKER ATLAS, A DIVISION OF WESTERN ATLAS INTERNATIONAL, INC.; IN THE 189<sup>TH</sup> JUDICIAL DISTRICT CXOURT, HARRIS COUNTY, TEXAS; ATTY RICHARD W. STAFF

03/12/03 DEPOSITION; CAUSE NO. 01-00259-E; BETTY J. NICKLEBERRY, ET AL V. CHARLES YIENG-CHU SU, M.D., ET AL; IN THE 101<sup>ST</sup> JUDICIAL DISTRICT COURT OF DALLAS COUNTY, TEXAS; ATTY ROBERT A. BLACKWELL

03/25/03 DEPOSITION; CAUSE NO. 2001-58756; ANTONIO RUZICKA V. PORT TERMINAL RAILROAD ASSOCIATION; IN THE 164<sup>TH</sup> JUDICIAL DISTRICT COURT OF HARRIS COUNTY, TX; ATTY GORDON HOLLOWAY

04/01/03 DEPOSITION; CAUSE NO. 2002-08089; DOLORESE CHARLYNE BROTEMARKLE VS. ABC, INC., ABC RADIO NETWORK, INC., THE WALT DISNEY CO., STEPHANIE FRANKLIN AND FRANCES EPSTEIN AND ABC, INC. D/B/A KMIC AM 1590; IN THE THE 55<sup>TH</sup> JUDICIAL DISTRICT COURT OF HARRIS COUNTY, TEXAS; ATTY SEAN GREENWOOD

04/14/03 DEPOSITION; CAUSE NO. 34,858-01-13; THOMAS E. SEMPREVIVO V. EDDIE DWAYNE BAILEY AND CLAMON CATTLE COMPANY, INC.; IN THE DISTRICT COURT OF ANGELINA COUNTY, TEXAS; ATTY RONALD BAIR

4/22/03 DEPOSITION; CAUSE NO. 17779-JG01; TERRY SNOW V S.I.I. CONSTRUCTION; IN 239<sup>TH</sup> JDC, BRAZORIA CO, TEXAS; ATTY BRUCE GAIBLE

04/23/03 CAUSE NO.: 2002-35696; AUGUSTINE BASALDUA V. PORT TERMINAL RAILROAD ASSOCIATION; IN THE 215<sup>TH</sup> JUDICIAL DISTRICT COURT OF HARRIS COUNTY, TEXAS; ATTY GORDON HOLLOWAY

4/25/03 TRIAL; CAUSE 2:02CVO3; WILLIAM LUCAS VS. PILGRIM'S PRIDE CORPORATION



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TESTIMONY HISTORY OF ROBERT COX

AND BUNCH AND ASSOCIATES, INC.; IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS, MARSHALL DIVISION; ATTY CURTIS  
FENLEY III

05/27/03 TRIAL; CAUSE 2001-64769; DONNIE L. HALL VS. DIAMOND OFFSHORE, ET AL.  
IN THE 215<sup>TH</sup> DISTRICT COURT OF HARRIS COUNTY, TEXAS; ATTY SCOTT  
BREITENWISCHER

07/23/03 DEPOSITION; DARLENE RODRIGUEZ VS FTI CONSULTING; USDC HOUSTON  
DIVISION; ATTY JOYCE KEATING

10/01/03 DEPOSITION; CAUSE NO. GN 202124; KIMBERLY KASEE V. LOOMIS FARGO & CO.  
AND RAUL SERNA GARZES; IN THE DISTRICT COURT OF TRAVIS COUNTY, TEXAS,  
261<sup>ST</sup> JUDICIAL DISTRICT; ATTY CLIFFORD L. HARRISON

12/08/03 CAUSE NO. 2002-17939; PATRICK DAVIS; 165<sup>TH</sup> DISTRICT COURT, HARRIS  
COUNTY, TEXAS; ATTY RICHARD M. LAW

12/18/03 DEPOSITION; CAUSE NO. 2002-45302; FRANKIE LEE FRIEMEL AND WIFE,  
VIRGINIA FRIEMEL VS. FRED HARTLEY, ET AL., IN THE 270<sup>TH</sup> JUDICIAL  
DISTRICT COURT, HARRIS COUNTY, TEXAS; ATTY N. ZITO

12/29/03 DEPOSITION; CAUSE NO. A-020157-C-A; SETH FREEMAN V. BAYER CORP., ET  
AL;  
IN THE 128<sup>TH</sup> JUDICIAL DISTRICT COURT OF ORANGE COUNTY, TEXAS; ATTY JOE  
TOMASELLI

12/30/03 DEPOSITION; CAUSE NO. 2002-09737; GLEN W. PERRY VS UNION PACIFIC  
RAILROAD CO. & PLAIN DEALING TRUCKING CO., INC.; IN THE 280<sup>TH</sup>  
JUDICIAL DISTRICT COURT OF HARRIS COUNTY, TEXAS; ATTY JAMES H. LIMMER

01/07/04 TRIAL; CAUSE NO. 2002-09737; GLEN W. PERRY VS. UNION PACIFIC RAILROAD  
CO. & PLAIN DEALING TRUCKING CO., INC.; IN THE 280<sup>TH</sup> JUDICIAL DISTRICT  
COURT OF HARRIS COUNTY, TEXAS; ATTY JAMES H. LIMMER

01/20/04 DEPOSITION; CAUSE 2002-59355; DANIEL RONQUILLO, BONNIE RONQUILLO,  
SHAUNNA RONQUILLO, DANIELLE RONQUILLO, DANIEL RONQUILLO, JR.,  
ADRIANNA RONQUILLO, AND FRANCIS RONQUILLO V. I. RAY KIRK, M.D.;  
11<sup>TH</sup> DISTRICT COURT, HARRIS COUNTY, TEXAS; ATTY RAINY DEMOSS

2/17/04 DEPOSITION; CAUSE NO. 2001-57216; LINDA FOSTER, INDIVIDUALLY, AND  
A/N/F  
OF WENDELL JAMAL LEWIS, A MINOR CHILD V. MOOL P. NIGAM, M.D. AND  
BAYSHORE MEDICAL CENTER; IN THE 152<sup>ND</sup> JUDICIAL DISTRICT COURT OF HARRIS  
COUNTY, TEXAS; ATTY NICOLE ANDREWS

02/27/04 DEPOSITION; CAUSE NO. 02-02-01231-CV; CONNIE WHEELER V. WERNER  
ENTERPRISES, INC., 221<sup>ST</sup> JUDICIAL DISTRICT COURT, MONTGOMERY COUNTY,  
TEXAS

05/21/04 DEPOSITION; CAUSE NO. 2003-24743; EUGENE SALAZAR V. MNG, L.L.C. D/B/A  
SYCAMORE APARTMENTS, PARIS GARRE AND DAN MEAUX D/B/A SYCAMORE  
APARTMENTS; IN THE 55<sup>TH</sup> JUDICIAL DISTRICT COURT OF HARRIS COUNTY,  
TEXAS; TERESA N. BURLISON, ATTY

05/27/04 TRIAL; CAUSE NO. 2002-36462; LAWANDA L. KELLER V. UCISCO, INC.; IN THE  
270<sup>TH</sup> JUDICIAL COURT OF HARRIS COUNTY, TEXAS; ERICH L. SCHENK, ATTY

07/13/04 DEPOSITION; JAMES CLARK AND SAMMY BARBER, ET AL V. EXXON MOBIL  
CORPORATION; IN THE DISTRICT COURT OF JEFFERSON, COUNTY; 58<sup>TH</sup>  
JUDICIAL DISTRICT; KAREN R. BENNETT, ATTY

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TESTIMONY HISTORY OF ROBERT COX

- 08/13/04 DEPOSITION; ROLANDO CANALES VS. INGERSOLL RAND COMPANY, RAMIRO GONZALEZ, INDIVIDUALLY AND D/B/A R&R PAVING; IN THE DISTRICT COURT HIDALGO COUNTY, TEXAS; 92<sup>ND</sup> JUDICIAL DISTRICT; MARK CANTU, ATTY
- 08/25/04 DEPOSITION; LARRY PEDERSON V. HOVENSA; BRITAIN H. BRYANT, ATTY
- 09/01/04 DEPOSITION; CAUSE NO. 2003-1746-CCL2; RON JOY V. EXXONMOBIL OIL CORPORATION AND PCS PHOSPHATE COMPANY, INC.; IN THE COUNTY COURT AT LAW #2, GREGG COUNTY, TEXAS; SUSAN E. DAVENPORT, ATTY
- 09/02/04 TRIAL; ROLANDO CANALES VS. INGERSOLL RAND COMPANY, RAMIRO GONZALEZ, INDIVIDUALLY AND D/B/A R&R PAVING; IN THE DISTRICT COURT HIDALGO COUNTY, TEXAS; 92<sup>ND</sup> JUDICIAL DISTRICT; MARK CANTU, ATTY
- 10/26/04 TRIAL; CAUSE NO. 2001-03623; JEWEL WILEY VS. WABASH NATIONAL CORPORATION, ET AL; DISTRICT COURT OF HARRIS COUNTY, TEXAS; 190<sup>TH</sup> JUDICIAL DISTRICT; DAVID TIPETTS, ATTY
- 12/22/04 DEPOSITION; CAUSE NO. 2003-CI-05507; ALEMAN V. WAL-MART STORES, 408<sup>TH</sup> JDC, BEXAR CO, TEXAS; ATTY NELDA ORTIZ
- 02/03/05 DEPOSITION; CAUSE NO. 03CV1740; CHARLES ERBEN HARRIS V. PORT TERMINAL RAILROAD ASSOCIATION; IN THE 405<sup>TH</sup> JUDICIAL DISTRICT COURT OF GALVESTON COUNTY, TEXAS; KYLE M. ROWLEY, ATTY
- 02/08/05 DEPOSITION; CAUSE NO. 2003-36885; BEN COBB AND LORI COBB V. TARGET CORPORATION, SUN BUILDERS CO., AND SQUARE D COMPANY; IN THE 269<sup>TH</sup> JUDICIAL DISTRICT COURT OF HARRIS COUNTY, TEXAS; WILLIAM A. SHERWOOD, ATTY
- 03/03/05 DEPOSITION; CAUSE NO. 03CV0764; LANCE DELOACH VS EXXON; 10<sup>TH</sup> JDC GALVESTON CO; JAMES HOLMES ATTY
- 05/06/05 DEPOSITION; MURDOCH VS ENGINEERING PROJECTS; 60<sup>TH</sup> JDC; JEFFERSON CO; BILL FEATHERSON ATTY
- 07/07/05 TRIAL TESTIMONY; CAUSE NO. 2003-CI-05507; ELSA ALEMAN VS WALMART; 408<sup>TH</sup> JDC; BEXAR CO, TEXAS; NELDA ORTIZ ATTY
- 08/01/05 DEPOSITION; DONALD AUCOIN; JOHN W. MIKUS, ATTY
- 11/14/05 TRIAL TESTIMONY; CAUSE NO. 2003-36885; BEN COBB AND LORI COBB V. TARGET CORPORATION, SUN BUILDERS CO., AND SQUARE D COMPANY; IN THE 269<sup>TH</sup> JUDICIAL DISTRICT COURT OF HARRIS COUNTY, TEXAS; ATTY SHERWOOD
- 1/19/06 DEPOSITION; RON GAINVEY VS ACE TRANSPORT; 280<sup>TH</sup> JDC; HARRIS CO; ATTY GEORGE WILHITE
- 02/27/06 DEPOSITION; CAUSE NO. 2003-45357; LAUREN TABER, ET AL V. CATHERINE NGUYEN ROUSH, M.D., ET AL; IN THE 334<sup>TH</sup> JUDICIAL DISTRICT COURT OF HARRIS COUNTY, TEXAS; ATTY LARRY THOMPSON
- 04/17/06 DEPOSITION; CAUSE NO. GN501645; DONNA NEDBALEK AND BLAKE NEDBALEK, AS NEXT FRIENDS OF KRISTEN NEDBALEK, A MINOR VS. NANCY A. TURNER, M.D.; TURNER, BACHUS & ASSOCIATES D/B/A A WOMAN'S PLACE; AND ST. DAVID'S HEALTHCARE PARTNERSHIP, LP. LLP D/B/A SOUTH AUSTIN HOSPITAL; 126<sup>TH</sup> JUDICIAL DISTRICT, TRAVIS COUNTY, TEXAS
- 06/07/06 DEPOSITION; CAUSE NO. 2003-49565; FREDERICK L. RISKE V. MAHNAZ SHAH, M.D., KELSEY - SEYBOLD MEDICAL GROUP, P.A. AND GRAMERCY SURGERY CENTER, LTD. D/B/A GRAMERCY OUTPATIENT SURGERY CENTER; IN THE 189<sup>TH</sup> JUDICIAL

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TESTIMONY HISTORY OF ROBERT COX

DISTRICT HARRIS COUNTY, TEXAS; ATTY RAINY DEMOS

06/15/06 DEPOSITION; CAUSE NO. 2004-72325; IVETTE N. VASQUEZ, ET AL V. JOSE D. DELVALLE; IN THE 129<sup>TH</sup> JUDICIAL DISTRICT COURT OF HARRIS COUNTY, TEXAS; ATTY RONALD BAIR

07/06/06 DEPOSITION; AAA#704600046805; JUAN CARLOS RUIZ VS SSP Partners, et al; Dallas Texas; ATTY PAUL DUNAGAN

08/10/06 CAUSE NO. 05-CV-0337; MIGUEL ARENAZAS, ET AL.VS. BP PRODUCTS NORTH AMERICA, INC., ET AL.; IN THE 212<sup>TH</sup> DISTRICT COURT OF GALVESTON COUNTY, TEXAS

CAUSE NO. 05-CV-0337-A; IN RE BP AMOCO EXPLOSION MARCH 23, 2005 COORDINATED DISCOVERY PROCEEDINGS; IN THE 212<sup>TH</sup> JUDICIAL DISTRICT COURT OF GALVESTON COUNTY, TEXAS

DEPOSITIONS: CALVIN BOLDS, PLAINTIFF & KENNETH GRANT, PLAINTIFF  
ATTORNEY: JAMES HEWITT

08/14/06 CAUSE NO. 05-CV-0337; MIGUEL ARENAZAS, ET AL. VS. BP PRODUCTS NORTH AMERICA, INC., ET AL.; IN THE 212<sup>TH</sup> DISTRICT COURT OF GALVESTON COUNTY, TEXAS  
CAUSE NO. 05-CV-0337-A; IN RE BP AMOCO EXPLOSION MARCH 23, 2005 COORDINATED DISCOVERY PROCEEDINGS; IN THE 212<sup>TH</sup> JUDICIAL DISTRICT COURT OF GALVESTON COUNTY, TEXAS  
DEPOSITIONS: RICKY BELL, PLAINTIFF & JESSE MONTALVO, PLAINTIFF  
ATTORNEY: APRIL MARBURGER

08/16/06 CAUSE NO. 05-CV-0337; MIGUEL ARENAZAS, ET AL. VS. BP PRODUCTS NORTH AMERICA, INC., ET AL.; IN THE 212<sup>TH</sup> JUDICIAL DISTRICT COURT OF GALVESTON COUNTY, TEXAS

CAUSE NO. 05-CV-0337-A; IN RE BP AMOCO EXPLOSION MARCH 23, 2005

COORDINATED DISCOVERY PROCEEDINGS; IN THE 212<sup>TH</sup> JUDICIAL DISTRICT COURT OF GALVESTON COUNTY, TEXAS

DEPOSITIONS OF PLAINTIFFS: ANDREW CODY PEARSON, MICHELLE PEARSON, PETER GIVENS, JUAN GUZMAN, GARY MC ENTYRE, NICHOLAS FALCON

ATTORNEY: JAMES HEWITT

09/20/06 TRIAL; CAUSE NO. 6-05CV-025; DEBORAH DALE V. THOMAS RUMAN & EXPLORER TRUCKING, INC., IN THE UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF TEXAS, SAN ANGELO DIVISION; ATTY NELDA J. ORTIZ

10/19/06 DEPOSITION; CAUSE NO. 05-CV-1230; CHARLES OKTAVEC V. HEALTHSOUTH DIAGNOSTIC CENTERS OF TEXAS LIMITED PARTNERSHIP D/B/A HEALTHSOUTH DIAGNOSTIC CENTER OF CLEAR LAKE, LARRY PATCHELL, M.D. AND CHERYL KANE; IN THE 212<sup>TH</sup> JUDICIAL DISTRICT, GALVESTON COUNTY, TEXAS; ATTY JAMES C. MARROW

12/05/06 DEPOSITION; CAUSE NO. 2005-59016; GERALDA SANTOS V. PRIME SOURCE BUILDING PRODUCTS AND LEE EDWARD MARTIN; IN THE 270<sup>TH</sup> JUDICIAL DISTRICT COURT OF HARRIS COUNTY, TEXAS; ATTY O. PAUL DUNAGAN

12/12/06 TRIAL; CAUSE NO. 2004-67051; TINA M. HOOD V. LONG LAKE LIMITED AND LONG LAKE LIMITED D/B/A POSTWOOD HOMES; IN THE 157<sup>TH</sup> JUDICIAL DISTRICT

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TESTIMONY HISTORY OF ROBERT COX

COURT; ATTY JAMES E. SIMMONS

01/11/07 TRIAL; CAUSE NO.; ISTRE V.; IN THE JUDICIAL DISTRICT COURT OF COUNTY;  
ATTY GEORGE WILHITE

02/16/07 DEPOSITION; GODDEAUX AND KINNARD VS BRITISH PETROLEUM; GALVESTON CO  
ATTY JAMES HEWITT

03/08/07 DEPOSITION; CAUSE NO. G-06-003; CURTIS W. JONES VS. UNION PACIFIC  
RAILROAD AND PIONEER OILFIELD TRUCKING, INC.; IN THE UNITED STATES  
DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS, GALVESTON DIVISION;  
CONSOLIDATION WITH CIVIL ACTION NO. G-06-067; ALFONSO ALVAREZ VS.  
PIONEER OILFIELD TRUCKING, INC., ET AL; IN THE UNITED STATES DISTRICT  
COURT FOR THE SOUTHERN DISTRICT OF TEXAS, GALVESTON DIVISION; ATTY  
JAMES H. LIMMER

04/16/07 DEPOSITION; RENTERIA VS ATTY BRIAN WENDT

05/09/07 DEPOSITION; CAUSE NO. 141-210309-05; TODD GUYTON VS LEGGETT & PLATT;  
141<sup>ST</sup> DC; TARRANT CO, TEXAS; ATTY MICHAEL JONES.

05/15/07 TRIAL; CAUSE NO. 2005-17513; TOYSHA ARMSTRONG VS CONCORD ROOST; 281<sup>ST</sup>  
JDC; HARRIS CO; ATTY CARLOS PENICHE.

6/7/07 Deposition; CAUSE 39309-06-02; JARRELL MARTIN VS WALMART STORES;  
DISTRICT COURT OF ANGELINA COUNTY, TEXAS; ATTY CONNIE HAWKINS

6/28/07 DEPOSITION; TRICKETT VS ATTY BRAD BARTLETT

7/26/07 DEPOSITION; DORMAN ATTY FULBRIGHT

8/01/07 DEPOSITION OF CHRISTOPHER HARPER; CAUSE NO. 05-CV-0337; MIGUEL  
ARENAZAS, ET AL. VS. BP PRODUCTS NORTH AMERICA, INC., ET AL.;  
IN THE 212<sup>TH</sup> DISTRICT COURT OF GALVESTON COUNTY, TEXAS

CAUSE NO. 05-CV-0337-A; IN RE BP AMOCO EXPLOSION MARCH 23, 2005  
COORDINATED DISCOVERY PROCEEDINGS; IN THE 212<sup>TH</sup> JUDICIAL DISTRICT  
COURT OF GALVESTON COUNTY, TEXAS

ATTY JAMES GALBRAITH

8/02/07 DEPOSITIONS OF ROBERT MC INTOSH; DAVID WILSON; NARA WILSON; CAUSE  
NO. 05-CV-0337; MIGUEL ARENAZAS, ET AL. VS. BP PRODUCTS NORTH  
AMERICA, INC., ET AL.; IN THE 212<sup>TH</sup> DISTRICT COURT OF GALVESTON  
COUNTY, TEXAS

CAUSE NO. 05-CV-0337-A; IN RE BP AMOCO EXPLOSION MARCH ER, 2005  
COORDINATED DISCOVERY PROCEEDINGS; IN THE 212<sup>TH</sup> JUDICIAL DISTRICT  
COURT OF GALVESTON COUNTY, TEXAS

ATTY JAMES GALBRAITH

8/03/07 DEPOSITIONS OF ROLANDO BOCARDO; TOMAS CANTU; DAVID JOE FUENTES,  
JR.; SCOTT KILBERT; CAUSE NO. 05-CV-0337; MIGUEL ARENAZAS, ET AL.  
VS. BP PRODUCTS NORTH AMERICA, INC., ET AL.; IN THE 212<sup>TH</sup> JUDICIAL  
DISTRICT COURT OF GALVESTON COUNTY, TEXAS

CAUSE NO. 05-CV-0337-A; IN RE BP AMOCO EXPLOSION MARCH 23, 2005  
COORDINATED DISCOVERY PROCEEDINGS; IN THE 212<sup>TH</sup> JUDICIAL DISTRICT  
COURT OF GALVESTON COUNTY, TEXAS; ATTY JAMES GALBRAITH

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TESTIMONY HISTORY OF ROBERT COX

9/17/07 DEPOSITION; CAUSE NO. 36774; JOE C. GARCIA V. DANAHER CORPORATION; 412<sup>TH</sup> DISTRICT COURT, BRAZORIA COUNTY, TEXAS; ATTY LARRY FUNDERBURK

9/19/07 DEPOSITION; CAUSE NO.2006-20029-158; FRANK E. JONES & MARIE JONES, INDIVIDUALLY & AS NEXT FRIEND FOR FRANK DANIEL JONES, A MINOR, VS. JEFFREY SCOTT CANTRELL, M.D., JEFFREY SCOTT CANTRELL, M.D., P.A. D/B/A ORTHOPEDIC ASSOCIATES, DAVID ROBERT MOON, M.D. & MEDICAL IMAGING OF DALLAS, LLP; ATTY SAKINA RASHEED

10/05/07 TRIAL; CAUSE NO. 36774; JOE C. GARCIA V. DANAHER CORPORATION; 412<sup>TH</sup> DISTRICT COURT, BRAZORIA COUNTY, TEXAS; ATTY LARRY FUNDERBURK

01/10/08 TRIAL; CAUSE NO. 2005-52056; TOMMY CHAMPION VS. PENSKE TRUCK LEASING CO., L.P., PENSKE TRUCK LEASING CORPORATION; GREAT DANE LIMITED PARTNERSHIP AND MAXON LIFT CORP.; IN THE 189<sup>TH</sup> JUDICIAL COURT OF HARRIS COUNTY, TEXAS; ATTY GREGORY HOLLOWAY

06/08/08 DEPOSITION; SHUMATE FOR RHODES IN AUSTIN TEXAS

6/03/08 DEPOSITION; CAUSE NO.B177168; VICKIE LYNN HALL V. EXXON MOBIL CORPORATION; IN THE 60<sup>TH</sup> JUDICIAL DISTRICT COURT OF JEFFERSON COUNTY, TEXAS; ATTY GREGORY HOLLOWAY

6/23/08 TRIAL; CAUSE NO. B177168; VICKIE LYNN HALL V. EXXON MOBIL CORPORATION; IN THE 60<sup>TH</sup> JUDICIAL DISTRICT COURT OF JEFFERSON COUNTY, TEXAS; ATTY GREGORY HOLLOWAY

10/6/08 DEPOSITION; CAUSE NO. 27875; JOHN CORNETT AND TERRY CORNETT V PATTERSON-  
UTI ENERGYS INC. AND BILLY DOE; IN THE 1<sup>ST</sup> JUDICIAL DISTRICT OF JASPER COUNTY, TEXAS; ATTY WILLIAM T. JONES, JR

4/17/09 DEPOSITION; RAMOS VS HINES INTERESTS; 269<sup>TH</sup> JDC; HARRIS CO; ATTY MIKE MAGEE

6/22/09 DEPOSITION; CAUSE NO. 2006-68686; BLADIMIR BARRIENTOS, MARIA GARZA INDIVIDUALLY AND A/N/F OF OSVALDO BARRIENTOS AND BLADIMIR BARRIENTOS, JR., MINORS V. DARLING HOMES, INC., DARLING HOMES OF HOUSTON, LTD.M AND JOHN K. HOMRIGHAUSEN; IN THE 334<sup>TH</sup> JUDICIAL DISTRICT COURT OF HARRIS COUNTY, TEXAS

7/9/09 DEPOSITION; ROBERTA BURKHART; 80JDC; HARRIS CO; PETER BAMBACE

7/16/09 TRIAL; CAUSE 2006-23345; CHARLES LEMMOND V. TEXAN EAGLE TRANSPORTATION; IN THE 215<sup>TH</sup> JUDICIAL DISTRICT COURT OF HARRIS COUNTY, TEXAS; ATTY: JOHN A. RAMIREZ

10/12/09 DEPOSITION; GARDENIER; ATTY JUNEK

10/22/09 DEPOSITION; SANDEL JOY; ATTY AMANDA FLANAGAN

10/28/09 TRIAL; CAUSE NO. 2006-65139; SANDRA CHRIST VS. COMPREHENSIVE PLUS HOME HEALTH, INC. AND BOBBY JONE BEASLEY; IN THE 234<sup>TH</sup> JUDICIAL DISTRICT COURT OF HARRIS COUNTY, TEXAS; ATTY: TRACEY R. BURRIDGE

11/03/09 DEPOSITION; CAUSE NO. 2008-5747; ANGELICA DAVIS AND DARRELL DAVIS V. CHRISTUS HEALTH GULF COAST D/B/A CHRISTUS ST.CATHERINE HOSPITAL; IN THE 129<sup>TH</sup> JUDICIAL DISTRICT COURT OF HARRIS COUNTY, TEXAS; ATTY ERIN LUNCEFORD

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TESTIMONY HISTORY OF ROBERT COX

- 11/03/09 TRIAL; CAUSE NO. 06-07-06852; BILL COMSTOCK AND LANA COMSTOCK, INDIVIDUALLY AND AS NEXT BEST FRIEND OF MEGAN RAE COMSTOCK V. M. JAMES CLARK, DDS AND NORTHWEST ORAL & MAXILLOFACIAL SURGERY, P.C.; ATTY JOEL RANDAL SPROTT
- 11/5/09 DEPO; ROBIN TISDALE JOHNSON VS FIRST TRANSIT; 270<sup>TH</sup> JDC HARRIS CO; ATTY GLEN FAHL
- 11/13/09 DEPO; GARY EVANS VS DEL MAR DISPOSAL; 14JDC DALLAS CO; PETER BAMBACE
- 11/30/09 DEPO; CAUSE NO. B179229; WILLIE FRANKLIN COWART AND DONNA J. COWART V. NEDERLAND APOSTOLIC CHURCH AND J.C. CORKRAN; IN THE 60<sup>TH</sup> JUDICIAL COURT OF JEFFERSON COUNTY, TEXAS; ATTY KATHERINE D. WOODRUFF
- 01/11/10 TRIAL; CAUSE NO. 2007-20572; ROBERTA BURKHART VS. VICTOR N. LOFTIN, ET AL; IN THE 80<sup>TH</sup> JUDICIAL DISTRICT COURT OF HARRIS COUNTY, TEXAS; ATTY PETER BAMBACE
- 03/22/10 DEPOSITION; CAUSE NO. 2008-60893; ANDREA MARTIN VS. ERIC J. HAUFRECT, M.D., JAMES EARL STREET, M.D., CAROL ASHWORTH, R.N., JILL CRIEP, CRNA, DIANA IRVIN, O.R.T., CAITLIN MOODIE, R.N. AND THE METHODIST HOSPITAL; IN THE 157<sup>TH</sup> JUDICIAL DISTRICT COURT OF HARRIS COUNTY, TX; ATTY CAROLYN SMITH
- 03/26/10 DEPO; MICHELLE RUSSELL; ATTY TRENT STEVENS
- 06/11/10 DEPO; ALEX DEWOODY; CAUSE NO. 2008-29777; BRIANNA KINNEY AND ANDRES DEWOODY; IND. AND A/N/F OF ALEXA DEWOODY, A MINOR VS. MICHELLE HANES, MEMORIAL HERMANN HOSPITAL SYSTEM D/B/A MEMORIAL HERMANN THE WOODLANDS HOSPITAL; IN THE 189<sup>TH</sup> DISTRICT COURT OF HARRIS COUNTY, TEXAS; ATTY STEVE DOLLINGER
- 07/02/10 DEPO; CAUSE NO. 352-228367-08; RANDY BLAKE BLEVINS AND LISA BLEINS V. PATMAN DRILLING INTERNATIONAL, INC. AND CHESAPEAKE OPERATIN, INC.; IN THE 352<sup>ND</sup> JUDICIAL DISTRICT OF TARRANT COUNT, TEXAS; ATTY KATHLEEN M. KENNEDY
- 07/06/10 DEPO; CAUSE NO. 2008-36829; DYLAN CLEWIS V. AIRTIME AMUSEMENTS, INC.; 165<sup>TH</sup> JUDICIAL DISTRICT COURT OF HARRIS COUNTY, TX; ATTY LEE STALEY
- 09/10/10 DEPO; CAUSE 2008-51886; MICHAEL REY FLORES VS. CYPRESS FAIRBANKS MEDICAL CENTER, INC. A/K/A CYPRESS FAIRBANKS CENTER HOSPITAL, GEORGE JOSPEH ABDO, M.D. AND STEPHEN VAN ROCKER, D.O.; 11<sup>TH</sup> JUDICIAL DISTRICT COURT, HARRIS COUNTY, TEXAS; ATTY FRANK DOYLE
- 02/07/11 DEPO; CAUSE NO. CV. 1:10-CV-193; ERNEST CHAPMAN V. GREAT AMERICAN INSURANCE COMPANY; IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT TO TEXAS, BEAUMONT DIVISION
- 3/09/11 TRIAL; ROXANNE UNDERWOOD IN FT BEND CO CT; JUDGE SHOWMAKE; ATTY FUNDERBURKE
- 03/30/11 Testify; CASE NO. 70 16000351 09; SV FILE 11.6881; AMERICAN ARBITRATION ASSOCIATION; HENRY V. H. E. BUTT; ATTY MARK GILTNER
- 4/18/11 DEPO; CAUSE NO. 2009-23502; RICK TJARKS VS. OASIS FIRE PROTECTION, INC. AND ANTHONY SPANO, JR.; 334<sup>TH</sup> JUDICIAL DISTRICT COURT, HARRIS COUNTY, TEXAS; ATTY JEFF A. FANAFF



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TESTIMONY HISTORY ROBERT D. COX

5/5/11 DEPO; CAUSE 2009-11576; ROMERO V JIMINEZ; 281<sup>ST</sup> JDC, HARRIS CO TEXAS;  
ATTY BILL SANFORD

5/9/11 DEPO; CAUSE NO.D183-385; MERCED FERNANDEZ V. CENTERPOINT; 136<sup>TH</sup> JDC,  
JEFFERSON CO, TEXAS; ATTY JOHN THOMISEE

7/25/11 DEPO; CARLISLE V HARRIS; 11<sup>TH</sup> JDC HARRIS CO; HENGES ATTY

8/11/11 DEPO; SWAFFORD (EEOC) V DYNMCDERMONT; USDC BEAUMONT; BROWN ATTY